



September 24, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Attn: Public Safety and Homeland Security Bureau
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114, GN Docket No. 17-183, ET Docket No. 13-49, and PS Docket No. 13-42

Dear Ms. Dortch,

On Thursday, September 19, 2019 representatives from the International Association of Fire Chiefs, the International Association of Chiefs of Police, the National Sheriffs' Association, and National Association of State EMS Officials met with members of the FCC Public Safety and Homeland Security Bureau to discuss Commission proceedings that concern the public safety community. Members of the bureau and public safety organizations attended both in-person and via conference call.

During the meeting, the parties reiterated the viewpoints expressed in their joint filing on wireless E-911 location accuracy requirements.¹ All representatives strongly support the establishment of a +/- 3 meter z-axis metric and do not see a need for the FCC to extend the implementation deadlines established in the *Fourth Report and Order*.² The group was of the opinion that the adoption of a z-axis metric would create regulatory certainty, thereby encouraging continued technological innovation. Also raised were the suggestions that, given the ongoing advancement of location accuracy solutions, the FCC might consider narrowing the z-axis metric in five years' time and narrow the x/y metric.

Participants in the meeting echoed the viewpoints expressed in the comments and reply comments of the National Public Safety Telecommunications Council regarding unlicensed use of the 6 GHz band.³ Representatives highlighted the need for rigorous testing of Automated Frequency Coordination (AFC) systems and suggested the FCC consider the National Institute of Standards and Technology as a potential testing body. Should an AFC mechanism be used to protect incumbents on the band, participants argued that this mechanism should be applied to both indoor and outdoor unlicensed devices.

Regarding transportation safety, meeting participants advocated that the 5.9 GHz band be reserved exclusively for transportation safety purposes. Representatives highlighted the life-saving potential of transportation communication systems to both the public and members of the emergency services.

Meeting participants highlighted the difficulties faced by public safety agencies in T-Band (470-512 MHz) jurisdictions, as they cannot expand the footprint of their communications networks.

¹ Reply Comments of IACP, IAFC, NSA, NASEMSO (filed June 18, 2019).

² Wireless E911 Location Accuracy Requirements, Fourth Report and Order, PS Docket No. 07-114 at 3.

³ Comments of NPSTC, PS Docket No. 07-114 at 4 (filed February 15, 2019).

Participants indicated that they to continue to advocate to preserve public safety access to the T-Band spectrum.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in the Electronic Comment Filing System and provided to the meeting attendees. Kindly refer any questions or correspondence regarding this matter to the undersigned.

Sincerely,

/s/ Brandon W. Allen

Brandon W. Allen
Manager, Government Relations
International Association of Fire Chiefs

cc: Erika Olsen,
Eric Burger
Michael Wilhelm
John Evanoff
Dr. Rasoul Safavian
Alex Espinoza, Attorney-Advisor
Nellie Foosaner, Attorney-Advisor

ATTACHMENT

FCC Meeting Attendees:

Erika Olsen, Senior Legal Counsel, Public Safety and Homeland Security Bureau (PSHSB)

Eric Burger, Chief Technology Officer, FCC*

Michael Wilhelm, Chief, PSHSB, Policy and Licensing Division (PLD)*

John Evanoff, Deputy Chief, PSHSB, PLD*

Dr. Rasoul Safavian, Technologist, PSHSB, PLD

Alex Espinoza, Attorney-Advisor, PSHSB, PLD*

Nellie Foosaner, Attorney-Advisor, PSHSB, PLD*

Public Safety Meeting Attendees:

Brandon W. Allen, International Association of Fire Chiefs*

Paul Fitzgerald, National Sheriffs' Association

Sarah Guy, International Association of Chiefs of Police

Kevin McGinnis, National Association of State EMS Officials

Paul Patrick, National Association of State EMS Officials

Eddie L. Reyes, International Association of Chiefs of Police

Chief Gregory M. Rubin, International Association of Fire Chiefs

* Signifies that the individual attended in-person

ATTACHMENT

IAFC, IACP, NSA, NASEMSO Meeting with FCC Offices

September 19, 2019 at 3:30PM ET

Group Agenda Items:

Introductions

Encouraging Commission Adoption of a Z-Axis Metric and the Maintenance of the Existing Implementation Timeline (PS Docket No. 07-114)

Supporting the Reservation of the 5.9 GHz Band for Transportation Safety Purposes

Unlicensed Use of the 6 GHz Band (GN Docket No. 17-183)

Supporting the Preservation of the T-Band (PS Docket No. 13-42)

Referenced Documents:

IAFC, NSA, and NASEMSO Location Accuracy Comments 05/2019

IAFC, IACP, NSA, NASEMSO Location Accuracy Reply Comments 06/2019

NPSTC 6 GHz Comments 02/2019

NPSTC 6 GHz Reply Comments 03/2019

U.S. Department of Transportation 5.9 GHz Resources 05/2019

IAFC Ex Parte PS Docket No. 07-114 and 13-42 04/2019

GAO Report 06/2019